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[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION

CHRISTOPHER SHREVES,
 INDIVIDUALLY AND ON
 BEHALF OF ALL OTHERS
 SIMILARLY SITUATED,

Plaintiff,

vs.

XUNLEI LIMITED, SEAN
 SHENGLONG ZOU, TAO
 THOMAS WU, J.P. MORGAN
 SECURITIES LLC, CITIGROUP
 GLOBAL MARKETS INC., AND
 OPPENHEIMER & CO. INC.,

Defendants.

No. 2:15-cv-04288-MWF-AS

**NOTICE OF NON OPPOSITION
 TO LEAD PLAINTIFF MOTION
 OF KEITH LAMBERT**

CLASS ACTION

JUDGE: Hon. Michael W. Fitzgerald

Hearing Date/Time: September 14,
 2015, 10:00 a.m.

Ctrm:1600-16th Floor, Spring Street

DOUG KEALLY,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

vs.

XUNLEI LIMITED, SEAN
SHENGLONG ZOU, TAO
THOMAS WU, J.P. MORGAN
SECURITIES LLC, CITIGROUP
GLOBAL MARKETS INC., AND
OPPENHEIMER & CO. INC.,

Defendants.

No. 2:15-cv-04524-MWF-AS

Keith Lambert respectfully submits this Notice of non-opposition to his motion for appointment as Lead Plaintiff and approval of his selection of The Rosen Law Firm, P.A. as Lead Counsel, dkt. # 26.

On August 7, 2015, Mr. Lambert timely filed his lead plaintiff motion and noticed it for hearing on September 14, 2015, dkt. # 26. That same day, movant Steven Barreto filed a lead plaintiff motion and likewise noticed it for hearing on September 14, 2015, dkt. # 24.

Therefore, the time to oppose the motions was August 24, 2015. *See* L.R. 7-9. Mr. Lambert filed his opposition to Mr. Barreto's lead plaintiff motion on August 24, 2015, dkt. # 31. No party has opposed Mr. Lambert's motion. Mr. Lambert's motion is unopposed.

The Court should grant the motion without a hearing.

1 Upon entry of an order granting the Mr. Lambert's motion, the
2 undersigned and defense counsel will confer and submit a joint proposed
3 schedule for the filing of an amended complaint and briefing schedule in
4 accordance with the Court's prior order, dkt. # 18.

5 Dated: August 27, 2015 Respectfully submitted,

6 **THE ROSEN LAW FIRM, P.A.**

7 /s/ Laurence M. Rosen

8 Laurence Rosen, Esq. (SBN #219683)

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14 [Proposed] Lead Counsel for Plaintiff
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CERTIFICATE OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing attorney of the Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On August 27, 2015, I electronically filed the following **NOTICE OF NON OPPOSITION TO LEAD PLAINTIFF MOTION OF KEITH LAMBERT** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on August 27, 2015.

/s/ Laurence M. Rosen

Laurence M. Rosen